

In this response, Applicants: (i) again respectfully traverse the §103(a) rejection of claims 1-3, 5-7 and 9-11 based on the combination of Hutchins and IBM TDB for at least the following reasons; and (ii) file a Notice of Appeal concurrent herewith.

As in their previous response, Applicants assert that the combination of Hutchins and IBM TDB fails to state a prima facie case of obviousness as required under §103(a), e.g., see M.P.E.P. §2143.

As set forth in M.P.E.P. §2143, three requirements must be met to establish a prima facie case of obviousness. First, there must be some suggestion or motivation to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited combination must teach or suggest all the claim limitations. While it is sufficient to show that a prima facie case of obviousness has not been established by showing that one of the requirements has not been met, Applicants respectfully believe that none of the requirements have been met.

First, there is a clear lack of motivation to combine the references. For at least this reason, a prima facie case of obviousness has not been established. Hutchins is directed to the performance of speech recognition, while IBM TDB is directed to building word models using sounds-like spellings for use in the performance of speech recognition. That is, the teachings in each reference are directed to completely different processes in speech recognition technology; one (Hutchins) toward actual real-time recognition of a spoken utterance, the other (IBM TDB) toward building models that may eventually be used in actual real-time recognition of a spoken utterance. However, other than a very general and conclusory statement in the Office Action, there is nothing in the two references that reasonably suggests why one would actually combine the teachings of these two references.

Second, Applicants assert that there is no reasonable expectation of success in achieving the present invention through a combination of Hutchins and TDB. For at least this reason, a prima facie case of obviousness has not been established. Despite the assertion in the Office Action, Applicants do not believe that Hutchins and TDB are combinable since it is not clear how one would combine them. There is no guidance provided in the present Office Action. However, even if combined, for the sake of argument, they would not achieve the automated registration techniques of the claimed invention.

Third, Applicants assert that even if combined, the combination fails to teach or suggest all of the limitations of the claims. For at least this reason, a prima facie case of obviousness has not been established.

Regarding independent claims 1, 5 and 9, the invention recites a method, apparatus and program code, respectively, for performing recognized word registration. First, a word inscription specified by a user is obtained. A word dictionary is searched to obtain a sounds-like spelling corresponding to the word inscription. A pronunciation dictionary is searched to obtain a base form corresponding to the sounds-like spelling that has been obtained. Then, the base form is registered in a speech recognition dictionary.

Hutchins is cited as teaching such steps with the exception of the concept of sounds-like spellings, which is said to be taught by IBM TDB. Applicants strongly disagree. As explained above, all of Hutchins' operations have to do with actually recognizing speech uttered by a user. The techniques of Hutchins have nothing to do with the registration of words in a speech recognition dictionary, as in the elements of claims 1, 5 and 9. While IBM TDB may make mention of the use of sounds-like spellings in building word models for use by a speech recognition system, the Examiner's attention is directed toward lines 12-13 of IBM TDB where it is stated that the technique described therein "proposes that sounds-like spellings be given by the user when it is wished to provide better data to the spelling-to-sound rules." Such rules may be used to add a word to the vocabulary of the speech recognition system.

Thus, IBM TDB teaches that the user actually inputs sounds-like spellings during the model building process. The claimed invention, as explained in the background and summary sections of the present specification, can overcome such a disadvantage. That is, as recited in claims 1, 5 and 9, after obtaining a word inscription specified by a user, the invention searches a word dictionary to obtain a sounds-like spelling corresponding to the word inscription. Thus, the user need not enter the sounds-like spelling since a word dictionary is searched to obtain a sounds-like spelling corresponding to said word inscription. A pronunciation dictionary is then searched to obtain a base form corresponding to the sounds-like spelling that has been obtained. Then, the base form is registered in a speech recognition dictionary. This is accomplished, for example as pointed out at page 13, line 21, of the present specification, "without a voice having to be recorded." This is not

what is disclosed by the IBM TDB technique, and certainly not by any combination of IBM TDB with Hutchins.

Thus, for at least the above reasons, Applicants request withdrawal of the §103(a) rejection of claims 1, 5 and 9.

Similar arguments apply to independent claims 2, 6 and 10, which also recite a method, apparatus and program code, respectively, for performing recognized word registration. In accordance with the claimed invention, a word inscription is specified by a user. A word dictionary is searched to obtain a plurality of sounds-like spellings that correspond to said word inscription and sounds-like spelling scores that correspond to the sounds-like spellings. The plurality of sounds-like spellings are displayed for the user. The sounds-like spelling that is selected by the user is obtained from among the plurality of sounds-like spellings. Then, a pronunciation dictionary is searched to obtain a base form and a pronunciation score corresponding to the sounds-like spelling that has been obtained. A determination is made as to whether the pronunciation score exceeds a predetermined threshold value. The base form is then registered in a speech recognition dictionary when the pronunciation score exceeds the predetermined threshold value.

Again, Hutchins has nothing to do with word registration and IBM TDB, for the same reasons as pointed out above, does not teach searching a word dictionary to obtain a plurality of sounds-like spellings that correspond to the word inscription and sounds-like spelling scores that correspond to the sounds-like spellings; displaying the plurality of sounds-like spellings for the user; obtaining the sounds-like spelling that is selected by the user from among the plurality of sounds-like spellings; searching a pronunciation dictionary to obtain a base form and a pronunciation score corresponding to the sounds-like spelling that has been obtained; determining whether the pronunciation score exceeds a predetermined threshold value; and registering the base form in a speech recognition dictionary when the pronunciation score exceeds the predetermined threshold value. The Office Action seems to point to IBM TDB for disclosing sounds-like spelling scores, and displaying sounds-like spellings to the user; however, Applicants find no such teachings in the reference. Also, since Hutchins has nothing to do with a word registration process, nothing therein teaches or suggests the elements of claims 2, 6 and 10. IBM TDB fails to remedy these deficiencies.

Thus, for at least the above reasons, Applicants request withdrawal of the §103(a) rejection of claims 2, 6 and 10.

Lastly, similar arguments apply to independent claims 3, 7 and 11, which also recite a method, apparatus and program code, respectively, for performing recognized word registration. The claimed invention determines whether first voice information obtained for a user's voice matches a predetermined condition. A speech recognition wizard panel that includes a new word input field and a sounds-like spelling input field is displayed on a display screen, when the voice information matches said predetermined condition. A new word and a sounds-like spelling that are entered in the speech recognition wizard panel are obtained. Second voice information based on the user's pronunciation provided for the new word and the sounds-like spelling is obtained. The second voice information, the new word and the sounds-like spelling are employed to specifically describe a base form. Then, the base form is added to a speech recognition dictionary. Neither Hutchins nor IBM TDB teach or suggest such a word registration technique that uses a speech recognition wizard panel, and such first and second voice information from the user. The Office Action seems to point to Hutchins for disclosing such a wizard panel and use of such user voice information; however, Hutchins has nothing to do with a word registration process. Also, no such details are disclosed in IBM TDB.

Thus, for at least the above reasons, Applicants request withdrawal of the §103(a) rejection of claims 3, 7 and 11.

Regarding the "Response to Arguments" section in the final Office Action, Applicants provide the following remarks.

Regarding motivation to combine Hutchins and IBM TDB, the Examiner merely repeats the very general and conclusory statement alleging that motivation exists in the references since it would be advantageous to "allow user to enter the information more accurately than the phonetic pronunciations." However, since Hutchins has nothing to do with word registration, it is unclear why this statement is relevant to any motivation to combine Hutchins with IBM TDB.

Regarding the contention that Hutchins has something to do with word registration merely because column 10, lines 1-11, of Hutchins mentions a "growing dictionary," Applicants respectfully point out that this still has nothing to do with a word registration process since Hutchins is only

mentioning ways of improving search time associated with a subsyllable dictionary when performing speech recognition. However, there clearly is no disclosure of a registration process in Hutchins.

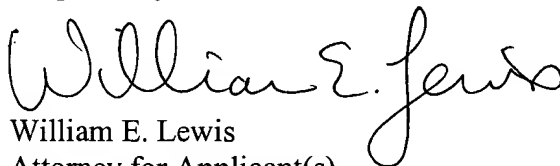
Regarding the other sections of Hutchins relied upon by the Examiner (e.g., sections of column 9, line 13, through column 11, line 42), Applicants again point out that none of these sections relate to word registration but rather relate only to speech recognition.

Lastly, the final Office Action states that "in response to applicant's arguments against the references individually, one cannot show nonobviousness by attacking references individually where the rejections are based on combinations of references." Applicants point out that while their arguments may, at times, discuss Hutchins and IBM TDB one at a time, it is in an effort to clearly illustrate that neither reference teaches or suggests one or more of the elements of the claimed invention. Thus, in general, by pointing out that reference 1 fails to disclose an element, say element A, and then pointing out that reference 2 also fails to disclose element A, the discussion effectively points out that the combination of the two references, even if proper, would fail to disclose element A.

It is believed that the claims of the application, i.e., claims 1-12, are patentably distinct over the art of record and are in condition for allowance. In the event that the Examiner believes that a telephone conference or a personal interview may facilitate resolution of any remaining matters, the undersigned may be contacted at the number indicated below. In view of the foregoing remarks, early and favorable reconsideration of this application is respectfully requested.

Please note that Applicants have filed a Notice of Appeal concurrent herewith.

Respectfully submitted,



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Date: February 27, 2003